UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 0 9 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL #7009 1680 0000 7677 8473
RETURN RECEIPT REQUESTED

Mr. Michael Austin
Associate Director of Environmental Health and Safety
University of Minnesota – FTCEM
501 23rd Avenue Southeast
Minneapolis, Minnesota 55455

Re: Notice of Violation
University of Minnesota - FTCEM
EPA ID No.: MN0 000 981 415

Dear Mr. Austin:

On July 24, 2014 a representative of the U.S. Environmental Protection Agency inspected the University of Minnesota – Fay Thompson Center for Environmental Management (U of MN – FTCEM) facility, located at 501 23rd Avenue Southeast, Minneapolis, Minnesota. The purpose of the inspection was to evaluate U of MN – FTCEM's compliance with its hazardous waste storage permit and certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. We have enclosed a copy of the inspection report for your reference.

Based on the information provided by U of MN - FTCEM personnel, a review of records and the inspector's personal observations while inspecting the facility, EPA finds that U of MN - FTCEM is in violation of its hazardous waste storage permit (Permit #MN 0000981415), certain requirements of the Minnesota Administrative Rules (Minn. R.), as well as certain RCRA regulations set forth in the Code of Federal Regulations (CFR).

1. The Permittee may store restricted wastes beyond one (1) year provided that the Permittee proves that such storage was solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal. See, Permit # MN0000981415, Part XI (c)(4).

At the time of the July 24, 2014 inspection, U of MN – FTCEM was storing one trimethylamie gas cylinder dated April 15, 2013, and three small (lecture bottles) gas cylinders (hexafluorethane, trifluoronethane and rhenium hexafluoride) with the date of June 10, 2013. Also, during my review of the weekly inspection logs for the permitted hazardous waste storage areas for the years 2012 and 2013, I observed records documenting hazardous waste gas cylinders and other waste stored over 1 year. (See chart in enclosed inspection report.) U of MN – FTCEM did not provide information to prove that such storage was necessary to facilitate proper recovery, treatment, or disposal.

2. The Permittee shall amend the contingency plan whenever the designated emergency coordinator changes. See, Permit # MN0000981415, Part IV B (1)(d).

   At the time of the July 24, 2014 inspection, U of MN – FTCEM's contingency plan was not updated to reflect that Brian Brosan replaced retired Gene Christenson as an alternate emergency coordinator. U of MN – FTCEM, therefore, failed to comply with the above referenced permit requirement.

3. The Permittee shall maintain records that document the training provided to each employee filling a position related to hazardous waste management. See, Permit # MN0000981415, Part V (C)(4).

   At the time of July 24, 2014 inspection, U of MN – FTCEM did not have documentation demonstrating that facility personnel David Johnson and Jon Wentworth took part in an annual review of the required hazardous waste training for the year 2012, and David Shepard for the year 2013. U of MN – FTCEM, therefore, failed to comply with the above-referenced permit requirement and also failed to comply with the training and record keeping requirements set forth in Minn. R. 7045.0454, subpart 6.D. [40 CFR 264.16(d)(4).]

Under Section 300(a) of RCRA, 42 U.S.C. 6928(a), EPA may issue an order assessing a civil penalty for any past or current violations and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than 30 days after your receipt of this letter documenting the actions, if any, that you have taken since the inspection to establish compliance with the above conditions and requirements. Please submit your response to Sheila Burrus, U.S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Burrus, of my staff, at (312) 886-3587.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: John Elling, MPCA (john.elling@state.mn.us)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOLLEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME:	University of Minnesota - FTCEM
U.S. EPA ID. No.:	MN0 000 981 415
LOCATION ADDRESS:	501 23rd Avenue Southeast Minneapolis, Minnesota 55455
NAICS CODES:	611310 – Colleges, Universities and Professional School
SITE OF INSPECTION:	July 24, 2014
U.S. EPA INSPECTOR:	Sheila Burrus

PREPARED BY:

Sheila Burrus
Environmental Protection Specialist

9/8/14
Date:

REVIEWED BY:

Michael Cunningham, Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division

9/9/14
Date:

Purpose of Inspection

The purpose of the inspection was to conduct an un-announced compliance evaluation inspection (CEI) at University of Minnesota – Fay Thompson Center for Environmental Management (U of MN – FTCEM), located at 501 23rd Avenue S.E. Minneapolis, Minnesota, to evaluate U of MN – FTCEM's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA) specifically those regulations related to the management of hazardous waste.

The U.S. EPA OECA Small Business Resource Information Sheet, the U.S. EPA – Region 5 Pollution Prevention Technical Assistance Contacts list, the Minnesota Technical Assistance Program (MNTAP) sheet and the U.S. EPA Managing Used Oil Advice for Small Business brochure were given to Brian Brosan, Environmental Health and Safety Specialist, of U of MN – FTCEM by the inspector, at the time of the inspection.

Participants: Brian Brosan, Environmental Health and Safety Specialist, Michael Austin, Associate Director of Environmental Health and Safety and Dave Johnson, Environmental Health and Safety Technician represented U of MN – FTCEM. Sheila Burrus represented EPA Region 5, Land and Chemicals Division.

Installation Description/Background

U of MN – FTCEM has a hazardous waste storage facility permit. Under the RCRA Part B permit, U of MN – FTCEM can store hazardous waste for up to one year.

The majority of waste that is managed and handled by U of MN – FTCEM comes from the University of Minnesota, local institutions and hospitals. U of MN – FTCEM generates a small amount of hazardous waste from its laboratories, drum clean-out, contaminated personal protective equipment, waste rags, etc.

The U of MN – FTCEM has been designed to manage wastes having a wide variety of physical and chemical properties, including corrosives, ignitable, reactive and toxic wastes. Wastes are received from many-generating activities throughout the university system as well as from non-university generators.

Hazardous wastes are segregated into individual storage rooms within the U of MN – FTCEM. The loading dock and staging areas are also approved storage areas.

U of MN – FTCEM performs lab packing within the permitted facility and bulks various wastes for re-manifesting to various TSDF's for proper disposal.

U of MN – FTCEM also collects, and stores universal waste lamps/batteries.

The current U of MN – FTCEM hazardous waste license, issued by Hennepin County, was visibly posted in a public area.

The U of MN – FTCEM is divided into 23 segregated rooms. These include 106 (Staging Area); 108 (Chemical Redistribution); 109 (Special Handling); 110 (Acid/Oxidizer Processing); 110A (Acid/Oxidizer Long Term Storage); 111 (Reactives Processing); 111A (Reactives Long Term Storage); 113 (Instrumentation lab); 114 (Wet Lab); 115 (Reclamation Treatment); 115B (Flammable Reclamation Treatment); 116 (Flammable Processing); 116B (Flammable Long Term Storage); 117 (Solvent Transfer Area); 117A (Bulk Storage Area); 118 (Gas Cylinders); 120 (Shipping and Receiving Loading Dock); 121 (Emergency Response Supplies); 122 (Supply Storage); 123 (Low Level Radioactive Processing); 123A(Radioactive Long Term Storage); 124 (Miscellaneous/Other Regulated Waste Processing); 124A (Miscellaneous/Other Regulated Waste Long Term Storage).

Opening Conference

I arrived at U of MN – FTCEM at 8:15 a.m. on August 24, 2014. I introduced myself and presented my enforcement credentials to Messrs. Brosan, Austin and Johnson and then explained the purpose of my visit.

Messrs. Brosan, Austin, Johnson and I convened in a conference room where I began to explain that I would like to conduct a CEI that included a records review and visual site inspection of the U of MN – FTCEM. I then conducted the opening conference with Messrs. Brosan, Austin and Johnson. I explained to them what specific records I would need to review.

Clean Harbors Aragonite, LLC located in Grantsville, Utah picks up its medical waste. Trade Waste Incinerator located in Sauget, Illinois picks up its lab packs. Veolia ES Technical Solutions located in Sauget, Illinois picks up its corrosive waste. Greencastle WDF facility located in Greencastle, Indiana picks up its waste flammable liquids. Veolia Environmental Services picks up its waste lamps. Interstate batteries located in Bloomington, Minnesota picks up its lead acid batteries.

Visual Site Inspection (VSI)

I began by conducting the VSI portion of the inspection. I was accompanied by Messrs. Brosan and Johnson during the VSI which began in room 106, of the permitted hazardous waste storage facility. I observed a large volume of closed/labeled containers of waste lamps wrapped in plastic waiting to be picked up (Photograph 1).

Next, we proceeded to room 108 where reusable and recyclable materials are stored for reuse (i.e., acids, oxidizers, solids, labware, glass containers, etc.) (Photograph 2).

We then proceeded to rooms 109 through 116A where I observed inventory in each room. The inventory in the combined rooms consisted of waste corrosive liquid, lab packs, monitoring equipment, waste batteries, and waste flammable solids. All containers were labeled and closed. I did not observe any evidence of spillage or waste mismanagement in any of the rooms (Photographs 3 through 14).

We proceeded to room 116B where I observed three flammable storage cabinets filled with bottles of 2-propanol, butyl acetate, and acetonitrile, etc. I also observed a 1,100 ml bottle of n-hexyl alcohol dated June 15, 1997, and a bottle of buffered formalin acetate dated with the year 2009. Mr. Johnson stated that the product/material is redistributed as needed. I asked Mr. Johnson how long is product/material held before someone decides to dispose of unused product. Mr. Johnson informed me that I would need to talk with Calvin Cole who is responsible for the oversight of the flammable storage cabinets. Mr. Cole was not working on the day of the inspection.

I also observed the storage of waste flammable liquid (acetic acid solution) (Photographs 15 through 22).

After leaving room 116B, we proceeded to room 117, the solvent transfer room. All hazardous waste containers greater than 5-gallons must be documented and profiled at a satellite location before accepted into this room. I observed a cart filled with bottles of hazardous waste solvent waiting to be transferred into one of the three 85 gallon hazardous waste solvent containers. A compatibility test is then performed after the hazardous waste is transferred to the 85-gallon containers before being transferring into the 2,500 gallon hazardous waste bulk storage tanks located in room 117A (Photographs 23 and 24).

Next, we entered room 117A, bulk storage area where three 2,500 gallon hazardous waste storage tanks are located. The first tank was filled to capacity, the second tank was one-third filled and the third tank was empty. The last shipment of 47,000 gallons of hazardous waste solvent was shipped off-site via tanker truck on June 16, 2014 (Photograph 25).

We then proceeded to room 118, where gas cylinders are located. I observed one trimethylamie gas cylinder dated April 15, 2013. I also observed three small (lecture bottles) gas cylinders (hexafluorethane, trifluoronethane and rhenium hexafluoride) with the date of June 10, 2013. I

informed Mr. Johnson that the cylinders were being stored over the one year time limit. Mr. Johnson stated that U of MN - FTCEM has had a difficult time finding someone to dispose of the cylinders (Photographs 26 through 29).

We entered rooms 121 through 123A where I observed a combination of emergency response equipment, supplies and radioactive waste. All containers were closed and labeled (Photographs 30 through 32).

We then proceeded to room 124 and 124A where miscellaneous/other regulated wastes are processed and stored. The inventory in the combined rooms consisted of PCB ballast, used oil, antifreeze, combustible liquid, oily rags, oil filters, waste toxic liquid, waste toxic solids, waste corrosive, x-ray film and waste caustic alkali liquid. All containers were closed and labeled (Photographs 33 through 35).

Records Review

After the completion of the VSI, I was assisted by Messrs. Brosan and Johnson during the records review portion of the inspection.

I informed Messrs. Brosan and Johnson that I wanted to review hazardous waste manifests, land disposal restriction forms, biennial reports, daily logs for hazardous waste bulk storage tanks, tank assessment certification for the bulk storage tanks and weekly inspection logs for the permitted hazardous waste storage area for the year 2013. I also requested for review the current contingency plan, waste analysis reports and hazardous waste training records for the years 2012 and 2013.

Contingency Plan

I reviewed U of MN – FTCEM contingency plan dated June 20, 2012.

The contingency plan was not updated to reflect that Brian Brosan replaced retired Gene Christenson as an alternate emergency coordinator.

Training Records

U of MN – FTCEM was unable to provide documentation showing that facility personnel David Johnson and Jon Wentworth took part in an annual review of the hazardous waste training required for the year 2012.

U of MN – FTCEM was unable to provide documentation showing that facility personnel David Shepard took part in an annual review of the hazardous waste training for the year 2013.

Weekly Inspection Logs

I reviewed U of MN – FTCEM weekly inspection logs for the permitted hazardous waste storage areas for the years 2012 and 2013. During my review of the weekly inspections logs I observed records documenting hazardous waste stored over 1 year. Attached is a chart that includes the dates the drums were filled, the dates the waste was disposed of, the number U of MN – FTCEM assigned to each container, the type of waste stored in each container and the waste code.

I reviewed hazardous waste manifests, land disposal restriction forms, biennial reports, tank assessment certification and daily inspection logs for hazardous waste bulk storage tanks for the year 2013, and waste analysis reports and found them to be complete.

Closing Conference

In closing, a brief conference was held. I summarized where Messrs. Brosan and Johnson had taken me during the VSI and what information they had presented to me. I thanked them for their cooperation and concluded the CEI at appropriately 4:45 p.m.

Attachment

Chart
Inspection Checklist
Photographs 1 through 35

Minnesota Pollution Control Agency

Report Title: Treatment, Storage, Disposal Facility (TSDF) Compliance Evaluation Inspection Checklist

Preferred ID: MND 000 981 415 Regulated Party: University of Minn-FTCEM

Date: 7/24/14 Inspector: Shaila Burrus 312-886-3587

FC: Licensing / EPA / Permits			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.1020 A	Metro Area - Does the Regulated Party have an approved license?	Yes	
7045.0225 1	Outstate - Does the site have a current hazardous waste generator license?	Yes	
FC: Waste Analysis Requirements			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0458 2, A	Does the waste analysis plan contain parameters for analysis and rationale for selection of those parameters?	Yes	
7045.0458 2, B	Does the Waste Analysis Plan contain test methods to fit the selected parameters? (including TCLP if appropriate)		
7045.0458 2, C	Does the Waste Analysis Plan contain suitable methods of sampling?		
7045.0458 2, D	Does the Waste Analysis Plan contain frequency of analysis / review information?		
7045.0458 2, E	For off-site Regulated Parties, is a waste analysis supplied by each Regulated Party?		
7045.0458 2, F	Does the Waste Analysis Plan consider other criteria including 1) LDR Criteria, 2) Vent & equipment leak test methods and procedures (RCRA organic air emissions, Subpart AA & BB) NOTE: These items are by referral to other rules and should be cited from those rules with reference from this rule.		
7045.0458 2, G,1	Are there procedures to verify the identity the waste upon arrival at the facility from an off-site generator?		

FC: Waste Analysis Requirements			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0458 2, G,2	Are there sampling methods to identify the waste upon arrival at the facility from an off-site generator(s), if needed?	Yes	

FC: Operating Record			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0478 2	Does the facility maintain a written operating record onsite?	Yes	
7045.0478 3, A	For facilities receiving hazardous waste from off-site, does the operating record contain the names and identification numbers of the generators?		
7045.0478 3, B	Does the operating record contain the date of arrival of each hazardous waste shipment and the transporter's name and identification number?		
7045.0478 3, C	Is there a description and quantity of each hazardous waste received and the method(s) and date(s) of each waste's treatment, storage or disposal?		
7045.0478 3, D	Does the operating record contain the location and quantity of each hazardous waste within the facility? For disposal facilities, is there a map or diagram of the disposal area showing the location and quantity of each hazardous waste? [This information should be cross referenced to specific manifest numbers.]		
7045.0478 3, E	Are there records and results of all waste analyses, trial tests, monitoring data, and operator inspections including process vent and equipment leak test methods, procedures, and record keeping requirements (Subpart AA & BB)?		
7045.0478 3, J	Are there closure and post-closure cost estimates?		

FC: Operating Record

Rule	Requirement	Compliance Status	Remarks
7045.0478 3, L	Is the certification signed by owner/operator or authorized rep?	Yes	

FC: General Facility Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0452 3, A	If facility receives hazardous waste from outside the US, has the facility given written notice to MPCA and EPA Reg.5 regarding receipt of hazardous waste from a foreign source?	N/A	
7045.0452 5, C	Is the inspection frequency for items in the inspection schedule based on possible deterioration rates of equipment? AND Are areas subject to spills inspected at least daily when in use?		

FC: Waste Evaluation

Rule	Requirement	Compliance Status	Remarks
7045.0458 2	Does the facility have a detailed waste analysis plan on site?	Yes	

FC: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0462 2	Are hazardous wastes managed to prevent releases?	Yes	
7045.0462 3, A	Does the facility have internal communications or alarm system capable of providing immediate emergency instruction?		
7045.0462 3, B	Is there an emergency telephone or device immediately available for summoning outside emergency responders?		

FC: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0462 3, C	Does the facility have fire control, spill control, and decontamination equipment?	Yes	
7045.0462 3, D	Is water available in adequate volume for all fire control needs?	↓	

FC: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7001.0520 1	Does the Regulated Party have a storage permit?	Yes	

FC: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.0261 7	Do manifests contain ALL of the following?: Manifest document number, generator data, transporter data, facility data, waste data, required signatures & dates, and a 24 hour emergency number. (document problem manifests in remarks and Description of Violation)	Yes	
7045.0298	If applicable, has the generator submitted to the MPCA an exception report for manifest copies not received back from the TSDF within 45 days of the date the waste was initially shipped?	↓	
7045.0294 1	Are signed facility copies of manifests available for review for 3 years from the date material was accepted by the initial transporter?	↓	
7045.0474 2, A	If the facility accepts hazardous waste from off-site: a. Does the facility sign and date each manifest?	↓	

FC: Manifests			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0474 2, B	b. If applicable, are any discrepancies noted directly on the manifest?	N/A	
7045.0474 2, D	c. Send a manifest copy to the generator and MPCA within ten days after delivery?	Yes	
7045.0474 2, E	d: Retain manifest copies for at least three years from the date of delivery?	Yes	
7045.0476 3, C	f. If applicable, notify the MPCA immediately if hazardous waste is delivered that facility is not permitted to manage?	N/A	
FC: Land Disposal Restrictions			
Rule	**Requirement**	**Compliance Status**	**Remarks**
268.7 (a), (2)	For waste or contaminated soil that does not meet treatment standards, has the Regulated Party sent a one-time land disposal restriction notification to the receiving treatment or storage facility? Is a copy of the notification available at the Regulated Party's site? Have new notifications been sent when there are changes in waste streams and to any new receiving facilities?	Yes	
7045.1315 2	Does the treatment facility test its wastes in accordance to the frequency specified in their waste analysis plan?		
7045.1315 2, A	For wastes with treatment standards expressed in concentrations in the waste extract, has the treatment facility tested treated waste residues or an extract of the residues and does the test method comply with federal requirements?		
7045.1315 2, C	For wastes with treatment standards expressed in concentrations of the waste, has the treatment facility tested the treated waste residues (not an extract)?		

FC: Land Disposal Restrictions			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.1315 2, F	For waste or treated residue that is further managed at a TSD facility, has the TSD sending the waste or treatment residues complied with generator notification and certification requirements?	Yes	
FC: Personnel Training			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0454 2	Does the Regulated Party have a Training Program Director trained in hazardous waste management procedures?	Yes	
7045.0454 1	Have all Regulated Party personnel who manage hazardous waste completed a training program (within 6 months of hire or transfer) that teaches the correct performance of their duties both in normal times and in times of emergency?	Yes	
7045.0454 6, B	Do the records contain job descriptions?	Yes	
7045.0454 6, C	Do the records contain descriptions of training?	Yes	
7045.0454 4	Have new employees completed hazardous-waste-management training within 6 months of hiring or assignment to a new position?	Yes	
7045.0454 5	Have employees received annual review of hazardous-waste-management training at least once per calendar year?	Yes / No	3 employees did not complete annual training for the year 2012 and/or 2013
7045.0454 7	Are employee training records retained for the lifetime of the facility or for three years after an employee leaves?	Yes	

FC: Contingency Plan			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0466 2	Does the facility have a contingency plan?	Yes	
7045.0466 5, B	Has a copy of the contingency plan been submitted to local police and fire departments, hospital or medical facility and other emergency response teams?	Yes	
7045.0466 4, A	Does the plan specify emergency response actions and procedures?	Yes	
7045.0466 4, C	Has the facility made and documented emergency arrangements with local authorities (fire dept., police, local hospital, and other potential emergency responders?	Yes	
7045.0466 4, D	Does the plan list emergency coordinator address and phones data? AND Do emergency coordinators have the authority to act (commit resources)?	Yes/No	Brian Brosak, alternate emergency coordinator info. Not included in C.P.
7045.0466 4, E	Does the plan list emergency equipment and include its location and a physical description of each?	Yes	
7045.0466 4, F	Is there an evacuation plan?	Yes	

FC: Closure / Post-Closure			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0486 3	Does the facility have an approved closure plan?	Yes	
7045.0486 3, A	Does the closure plan include: 1. A detailed description of how each hazardous waste unit will be closed, and how the facility will finally be closed?	✓	

FC: Closure / Post-Closure			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0486 3, B	2. An estimate of the maximum inventory of hazardous waste ever stored on-site during the active life of the facility and a detailed description of methods to be used during partial and final closure of the facility?	Yes	
7045.0486 3, C	3. A detailed description of steps needed to remove or decontaminate residual hazardous waste and equipment at the site?		
7045.0486 3, E	4. A schedule for closure of each hazardous waste unit and final closure of the facility?		
7045.0486 3, F	For facilities that use trust funds to establish financial assurance: Does the facility have an estimate of the expected year of closure?		
7045.0486 4	Did the facility properly amend the closure plan, if required?		
7045.0502 1	Does the facility have a closure cost estimate?		
7045.0502 2	Do the cost estimates include adjustments for inflation?		
7045.0490 2	For Disposal Facilities and specified others, does the Regulated Party have an approved post-closure plan?	Yes	
7045.0490 3, A	Does the Postclosure Plan include a detailed description of the planned monitoring activities and frequencies at which they are performed after closure?		
7045.0490 3, B	Does the Postclosure Plan include a description of the planned maintenance activities and the frequencies at which they will be performed after closure?		

FC: Closure / Post-Closure

Rule	Requirement	Compliance Status	Remarks
7045.0490 3, C	Did the facility properly amend the Postclosure Plan, if required?	N/A	
7045.0506 1	Does the facility have current cost estimates for postclosure monitoring and maintenance requirements?		
7045.0506 2	Do the cost estimates include yearly adjustments for inflation?		
7045.0508 1	Does the facility have financial assurance for postclosure care?		exempt from all financial assurance

FC: Corrective Action (at a TSD Facility)

Rule	Requirement	Compliance Status	Remarks
7045.0485 1	Is the Regulated Party undertaking corrective action as necessary for all releases to the environment, to protect human health and the environment?	Yes	
7045.0485 2	Does the Regulated Party's permit contain schedules of compliance for required corrective action?		
7045.0512 1	Does the Regulated Party have a written estimate of the cost to perform corrective action?		
7045.0512 2	Is there a yearly update of the cost estimate for corrective action?		
7045.0514 1	Is there assurance of financial responsibility for completing corrective action?		exempt from all financial assurance Requirements

FC: Transporters			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.03024	If facility imports hazardous waste from a foreign country, are manifest requirements met? (Generator EPA ID not needed. Importer's address and signature can replace generator's.)	N/A	
FC: Record Keeeping Requiremements			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.04546, A	Do the records contain job titles?	Yes	